

In the matter of the petitions for rule making RM-10805 through RM-10811 we offer the following comments as licensed Amateur Radio Operators (AROs), Life Members of the American Radio Relay League (ARRL), coordinators for Dayton SKYWARN (www.dayton-skywarn.org), occasional HF contesters, and participants in the Adopt-A-Ham program operated in our local area (see Feb 1996 QST and ARRL publication - Ham Radio...Planning for the Future 2000, pages 46 & 48).

We fully support elimination of Element 1 (CW) as a regulatory requirement for all classes of licenses in the Amateur Radio Service.

We recognize the need and value to making modifications to the Amateur Radio Service structure with respect to the modes and privileges afforded under the current three classes of licenses. We endorse overall the comments filed by William Osler, K0RGR as a thorough evaluation of this series of petitions. However, we would amplify and constrain K0RGRs comments as follows:

- 1) Should CW testing be retained as a licensing incentive (vice a regulatory requirement) we concur that it should only be applied to the Extra Class, not any lower class license, and should be limited to the current Element 1 requirement of 5 words per minute. In the words of a very dear friend, mentor/Elmer and now Silent Key, Francis (Frank) Schwab, W8OK – “CW is an Art – be an artist”. For those so inclined let them hone their artistry.
- 2) The current Advanced sub-bands (80, 20 and 15 meters) should not be opened to General Class and below (as an incentive to upgrading, with or without Element 1).
- 3) When addressing the privileges of the Technician class license, in light of elimination of the CW requirement, no additional (or very limited) Phone privileges below 30 MHz (beyond that currently granted for Novice and Technician Plus) should be granted. In the event additional privileges are granted no phone privileges on 20M should be included. We believe granting extensive Phone privileges below 30 MHz would be a “disincentive” to upgrading from the entry-level Technician Class license.

Respectfully Submitted

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